

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

This Document Relates to:

Claimant, Phillip Hunt
Claim Number: 80028

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: Doc. 27192

Hearing Date: December 12, 2024 at 1:00 P.M. ET

Objection Deadline: December 6, 2024 at 4:00 P.M. ET

**CLAIMANT 80028'S RESPONSE
IN OPPOSITION TO THE DEBTORS' 129TH OMNIBUS OBJECTION**

Comes now, Phillip Hunt, Claimant 80028 (hereinafter "Claimant" or Claimant 80028"), and herein submits his response to the Debtors' 129th Omnibus Objection. In the 129th Omnibus Objection, the Debtor objected to the Claimant's Proof of Claim, stating that after "Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the Claimant." *See* Debtors' 129th Omnibus Objection (Doc. No. 27192-2) at p. 11.

However, emails received from FTX confirm various deposits were made by the Claimant into his FTX account on July 4 and 17, 2022. **See Composite Exhibit A.** The attached emails show the following deposits:

July 4, 2022 (USDC)

Your deposit of 11142.27897400 USDC (txid 0xc7b72d76abcc4b211abdabd8527c38a8b18e726b0bb9893785d0a8c8c3811904) has been received and credited to your Main account.

July 4, 2022 (BTC)

Your deposit of 1.61313092 BTC (txid f29b11ab4e79e2bd7c8dcb9507552f4328e865163d17d53fb9cee7d46c80c00e) has been received and credited to your Main account.

July 4, 2022 (SHIB):

Your deposit of 1713564806.63343042 SHIB (txid 0xfde4c47fc482ebc42cac9154af6e58ec1029d8ae4dcba1cde873a4bae8dac649) has been received and credited to your Main account.

July 4, 2022 (ETH):

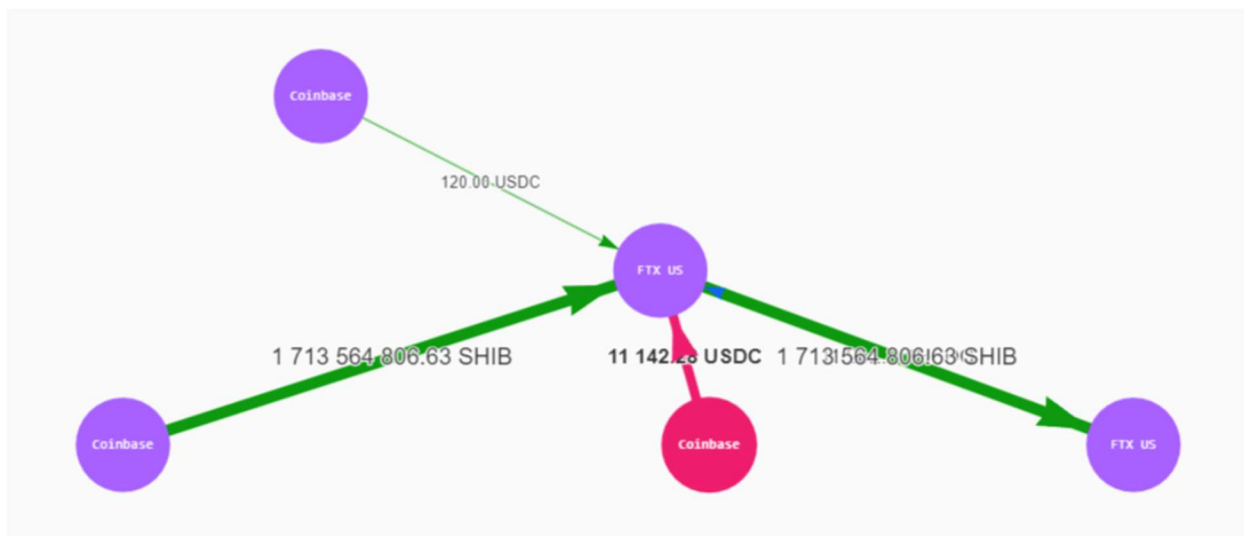
Your deposit of 6.59887016 ETH (txid 0x37ac2a5a30f017b210078d45d56863c0e21676f1e6c43700657b827f3f3f76b2) has been received and credited to your Main account.

July 17, 2022 (USDC):

Your deposit of 120.00000000 USDC (txid 0x0df3e5ecf3cf6c411bb2f06efa0a1bb070961dab7b1b6ab3c8c57108d27f7816) has been received and credited to your Main account.

Cryptocurrencies are traded on the Blockchain where every transaction is recorded. We used blockchain analytics software to trace the Claimant's cryptocurrency. The attached Blockchain Analytics reports show that the Claimant deposited BTC¹, ETH, USDC and SHIB into his FTX wallets where they remained up until the time FTX filed bankruptcy. FTX US Wallet Address: f6da30e1491e4a717d7cce8e6fe840e0e58aaa1f

¹ While the FTX deposit confirmation emails (attached) show that the Claimant deposited BTC into his FTX account on July 4, 2024, tracing of the 1.61313092 BTC suggests this was not deposited into a FTX wallet. It appears from the trace that FTX deposited this asset into a different account. Given the massive fraud perpetrated by FTX on its customers, this finding is not as surprising as it otherwise would be.



Claimant's Transfer of 6.6 ETH to His FTX Wallet
 816c0ecaf18b38c0534fdda26025938c54d7eb8e:



Per the attached reports, it appears that the assets transferred on the ETH chain remained in Claimant's FTX.com or FTX.US accounts/wallets at the time FTX froze all accounts and subsequently filed for bankruptcy. *See* Blockchain Analysis Reports attached as Exhibit B (ETH

Trace) and Exhibit C (BTC Trace). Regarding, the 1.613 BTC, tracing was difficult as it appears that FTX commingled assets and also possibly used wallets that were not on the FTX platform.

As reflected in Exhibit B and C, it is Claimant's position that, contrary to the Debtor's objections, he is entitled to a recovery from the bankruptcy estate, including but not limited to the following:

- USDC: $11,142.278974 = \sim \$11,262.28$
- SHIB: $1,713,564,806.63343042 \times 0.0000098 = \$16,792.94$
- ETH: $6.59887016 \times \$1,258.84 = \$8,306.92$
- BTC*: $1.61313092 \times \$16,871.63 = \$27,216.15$

Total USD Value: \$63,578.29

While he was not able to locate confirmation emails for some of the deposits, the Claimant asserts that he also held another **5.4 ETH (\$6,799.25)** and approximately **20,0000 ADA (\$6,995.84)** which would bring the total entitlement to: **$\sim \$77,178.78$ (USD)**.

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Wherefore, Claimant respectfully request that the claim be modified to **\$77,178.78**
(USD).

Dated: 12/6/24

Respectfully submitted,

By:

/s/ Deirdre M. Richards

Deirdre M. Richards (#4191)

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